

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT, L.L.C., CONTRARIAN CAPITAL FUND I, L.P., CONTRARIAN DOME DU GOUTER MASTER FUND, LP, CONTRARIAN CAPITAL SENIOR SECURED, L.P., CONTRARIAN EM II, LP, CONTRARIAN EMERGING MARKETS, L.P., POLONIUS HOLDINGS, LLC, CONTRARIAN FUNDS L.L.C., EMMA 1 MASTER FUND, L.P., and E1 SP, A SEGREGATED ACCOUNT OF EMAP SPC,

Plaintiffs,

V.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

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: Case No. 19 Civ. 11018 [rel.  
: Nos. 19 Civ. 3123, 18 Civ. 11940,  
: 20 Civ. 10342, 21 Civ. 597 & 21 Civ.  
: 2678]  
:

: Hon. Analisa Torres

**NOTICE OF MOTION OF SULLIVAN & CROMWELL FOR LEAVE TO WITHDRAW  
AS COUNSEL FOR DEFENDANT BOLIVARIAN REPUBLIC OF VENEZUELA**

**PLEASE TAKE NOTICE THAT**, upon the accompanying Memorandum of Law and Declaration of Joseph E. Neuhaus Submitted for *In Camera* Review, both dated August 23, 2023, Sullivan & Cromwell LLP, pursuant to Local Civil Rule 1.4, moves the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order permitting Sullivan & Cromwell to withdraw as counsel of record in the above-captioned case.

Dated: August 23, 2023  
New York, New York

Respectfully submitted,

/s/ Joseph E. Neuhaus

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